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REMARKS

Claims 1-9 are pending in the application. Claims 1 and 8-9 are amended herein. Favorable reconsideration of the application, as amended, is respectfully requested.

I. CLAIM AMENDMENTS

Claim 1 has been amended to recite that each text unit comprises a plurality of strings, with each text unit having a same structure. Such amendment incorporates features of claim 3, wherein it is recited that the text units are sentences and the strings are words forming the sentences, and thus does not represent any new issues of patentability.

Also, claim 1 is amended to correct a clarity issue which arose during amendments in the international stage of the application. Such amendment is intended to clarify the reading and understanding of the claim, and does not raise new issues of patentability. Support for the amendment is found, for example, at page 8, lines 5-11 of the application.

Claims 8 and 9 are amended merely to remove a reference label.

II. REJECTION OF CLAIMS 1-3, 7 AND 9 UNDER 35 USC §103(a)

Claims 1-3, 7 and 9 remain rejected under 35 USC §103(a) based on *Inaba et al.* in view of *Chen et al.* Withdrawal of the rejection is respectfully requested for at least the following reasons.

The Examiner has maintained the rejection of Claims 1-3, 7 and 9 based on *Inaba et al.* in view of *Chen et al.* Beginning on page 10 of the Office Action, the Examiner responds to the applicant's arguments. Specifically, the Examiner continues to rely on the discussion in *Inaba et al.* of cooccurrence among the words, specifically referring to column 11, line 42-column 12, line 40. The Examiner argues that each pair "text units" is not limited to sentences, and could be words, phrases or sentences. Furthermore, the Examiner contends that the claim language does not exclude different documents, the same document or the same sentence.

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Claim 1, as amended, clarifies that each text unit comprises a plurality of strings. This addresses the Examiner's concern that each text unit may simply be a single word. Further, claim 1 clarifies that the text units have the same structure, e.g., all the text units are sentences. This addresses the Examiner's concern that the pairs of text units can be different, e.g., a word and a sentence.

Inaba et al. is concerned with looking for the cooccurrence of words in the same document or sentence. The present invention, on the other hand, is looking for the occurrence of the same word in different documents or sentences. Consequently, *Inaba et al.* further does not teach summing the number of occurrences of each other text unit in the same structure or structures to form an individual score as recited in claim 1.

More specifically, *Inaba et al.* only teaches indexing single words, and does not teach or suggest associating pairs of text units where each text unit has the same structure (e.g., is a sentence) and comprises a plurality of strings (e.g., a plurality of words).

Furthermore, applicant emphasizes the features of Claim 3 wherein the text units are specified as being sentences and the strings are specified as words forming such sentences. This avoids the Examiner's interpretation that the claim language does not exclude different documents, same documents, same sentences, etc.

Inaba et al. describes a document retrieval system for searching a document coinciding with a retrieval request inputted by the user. *Inaba et al.* describes determining the frequency at which words of the retrieval request appear in the documents. However, there is no teaching or suggestion in *Inaba et al.* as to any determination of lexical cohesion among text units where each text unit has the same structure and includes a plurality of strings. Even more specifically, there is no teaching or suggestion of the formation of the structures and scoring based on each *pair of text units* as recited in claim 1.

Chen et al. does not make up for the deficiencies in *Inaba et al.* *Chen et al.* teaches generating a list for each word of the document which identifies each sentence in which that word occurs. (Column 5, lines 36-41). *Chen et al.* also teaches

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developing candidate phrases from the text which appear reasonable. The frequency of words within phrases and the frequency of the phrases are then used to select key words for a document because of the belief that the most frequency phrases are most likely to be indicative of the document content. (Column 5, line 45-column 6, line 2).

Accordingly, *Chen et al.* describes a structure in which a list of words or phrases are presented in relation to their frequency in a document. Such simple frequency structure does not represent a structure in which a string (e.g., word or phrase) is associated with each pair of text units (e.g., pair of sentences or pair of documents) in which the string occurs as recited in claim 1. Hence, *Chen et al.* does not make up for the deficiencies in *Inaba et al.*

Therefore, even if the teachings of *Inaba et al.* and *Chen et al.* were to be combined, the claimed invention would not result.

For at least the above reasons, applicants respectfully submit that the rejection of claim 1 should be withdrawn. *Inaba et al.* and *Chen et al.*, whether taken alone or in combination, do not teach or suggest a method as recited in claim 1.

Furthermore, the various dependent claims may be distinguished based on the features recited therein. For example, as mentioned above claim 3 recites how the text units are sentences. Neither *Inaba et al.* nor *Chen et al.* teach or suggest text units being specifically sentences, as recited in claim 3.

As a result, withdrawal of the rejection is respectfully requested.

III. REJECTIONS OF CLAIMS 4-6 AND 8 UNDER 35 USC §103(a)

Claims 4 and 8 are rejected under 35 USC §103(a) based on *Inaba et al.* in view of *Chen et al.*, and further in view of *Liddy*. Claims 5 and 6 are rejected under 35 USC §103(a) based on *Inaba et al.* in view of *Chen et al.* and *Liddy*, and further in view of *Baker*. Each of these rejections is respectfully traversed for at least the following reasons.

Claims 4-6 and 8 each depend from claim 1, either directly or indirectly. As a result, each can be distinguished over the teachings of *Inaba et al.* and *Chen et al.* for

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at least the same reasons discussed above. Furthermore, neither *Liddy* nor *Baker* make up for the deficiencies in *Inaba et al.* and *Chen et al.* Consequently, withdrawal of the rejections is respectfully requested.

IV. CONCLUSION


Accordingly, all claims 1-9 are believed to be allowable and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Should a petition for an extension of time be necessary for the timely reply to the outstanding Office Action (or if such a petition has been made and an additional extension is necessary), petition is hereby made and the Commissioner is authorized to charge any fees (including additional claim fees) to Deposit Account No. 18-0988.

Respectfully submitted,

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